

Attorney's Docket No. 033079-003Application No. 10/025,409

Page 2

Granberg, however, does not disclose or suggest transmitting the calling subscriber number identification received at a GSM GMSC of a home GSM/UMTS PLMN towards a destination subscriber who is roaming in a visited non-GSM/UMTS network. Consequently, Granberg fails to disclose or suggest *forwarding, from the HLR in the home GSM PLMN towards an Inter-Working Function ("IWF") used in intersystem roaming, a second interrogating GSM/UMTS MAP operation including the received calling subscriber number identification, and including the received calling subscriber number identification in an interrogating non-GSM/UMTS MAP operation to be submitted from the IWF towards a non-GSM MSC/VLR in the visited non GSM/UMTS PLMN where the destination subscriber is roaming, as recited for example in Claim 51.*

In particular, Granberg fails to disclose forwarding of the second interrogating GSM/UMTS MAP operation, including the received calling subscriber number identification, from the GSM HLR towards the IWF; and the interrogating non-GSM/UMTS MAP operation to be submitted from the IWF towards a non-GSM MSC/VLR.

In the same field of endeavor as Granberg, Olsson discloses transporting short message service (SMS) messages within a telecommunication network that follows a GSM standard. As Olsson recognizes at col. 1, lines 53-56, SMS messages are non-speech services fully covered by, and included in, the GSM system. In this respect, short messages and speech, as well as other data services, are well-known services of a GSM system. Therefore, Olsson describes on col. 3, lines 25-41 a traditional sequence of actions carried out between a GSM GMSC, a GSM HLR, and a GSM MSC-VLR to obtain routing information for reaching a called

Attorney's Docket No. 033079-003Application No. 10/025,409

Page 3

subscriber. This traditional sequence of actions disclosed by Olsson is the same as described in the present application as exemplary prior art, and illustrated in Fig. 1.

In this respect, the operation cited therein by Olsson for SMS support is a GSM/UMTS MAP operation: the so-called "SRI"; and there is no citation of a non-GSM/UMTS MAP operation.

Moreover, the Interworking Function cited by Olsson is equipment included in the GMSC for handling non-voice data transmission and neither receives an interrogating GSM/UMTS MAP operation from a GSM HLR, nor interrogates a non-GSM MSC/VLR with a non-GSM/UMTS MAP operation. In this respect, Olsson does not even address any problem derived from communications, speech or non-speech related, between a home PLN and a visited PLMN of a different nature, GSM network and non-GSM network.

Accordingly, Olsson fails to overcome the deficiencies set forth above with respect to Granberg. Olsson fails to disclose the forwarding of the second interrogating GSM/UMTS MAP operation, including the received calling subscriber number identification, from the GSM HLR towards the IWF; and the interrogating non-GSM/UMTS MAP operation to be submitted from the IWF towards a non-GSM MSC/VLR.

Accordingly, Granberg and Olsson, when considered both separately and in combination, fail to disclose or suggest independent Claim 51. Claims 52-56 depend variously from allowable Claim 51, and are therefore likewise allowable for at least the same reasons.

Independent claim 62 is an apparatus claim with subject matter similar to Claim 51, and is likewise allowable for at least the same reasons as Claim 51.

Claims 63-67 depend variously from allowable Claim 62, and are therefore likewise allowable for at least the same reasons.

Granberg likewise fails to disclose or suggest Claim 57. In particular, Granberg fails to disclose or suggest transmitting a calling subscriber number identification received at a GMSC of a home non-GSM/UMTS PLMN, along with an incoming call, towards a destination subscriber who is roaming in a visited GSM/UMTS PLMN, as encompassed by Claim 57. Consequently, Granberg fails to disclose or suggest *forwarding, from the HLR in the home PLMN towards an Inter-Working Function ("IWF") used in intersystem roaming, a second interrogating non-GSM/UMTS MAP operation including the received calling subscriber number identification, and including the received calling subscriber number identification in an interrogating GSM/UMTS MAP operation to be submitted from the IWF towards a visited Mobile Switching Centre ("MSC/VLR") in the visited PLMN where the destination subscriber is roaming*, as recited in Claim 57.

For example, Granberg fails to disclose the forwarding of the second interrogating GSM/UMTS MAP operation, including the received calling subscriber number identification, from the non-GSM/UMTS HLR towards the IWF; and the interrogating GSM/UMTS MAP operation to be submitted from the IWF towards a GSM MSC/VLR.

Olsson discloses transporting short message service (SMS) messages within a telecommunication network that follows a GSM standard. Therefore, the Interworking Function cited by Olsson is equipment included in the GMSC for handling non-voice data transmission and neither receives an interrogating non-GSM/UMTS MAP operation from a non-GSM/UMTS HLR, nor includes the calling

Attorney's Docket No. 033079-003Application No. 10/025,409

Page 5

subscriber number identification received in this non-GSM/UMTS MAP interrogating into a GSM/UMTS MAP interrogation towards a GSM MSC/VLR. In this respect, Olsson does not even address any problem derived from communications, speech or non-speech related, between a home PLMN and a visited PLMN of a different nature, GSM network and non-GSM network.

Thus, Olsson likewise fails to disclose the forwarding of the second interrogating non-GSM/UMTS MAP operation, including the received calling subscriber number identification, from the non-GSM/UMTS HLR towards the IWF; and the interrogating GSM/UMTS MAP operation to be submitted from the IWF towards GSM MSC/VLR. Olsson fails to overcome the deficiencies of Granberg set forth above with respect to Claim 57.

Accordingly, Granberg and Olsson, when considered both separately and in combination, fail to disclose or suggest Claim 57. Claims 58-61 depend variously from allowable Claim 57, and are therefore likewise allowable for at least the same reasons.

Independent claim 68 is an apparatus claim with subject matter that is similar to the subject matter of Claim 57, and is likewise allowable for at least the same reasons set forth with respect to Claim 57. Claims 69-72 depend variously from allowable Claim 68, and are therefore likewise allowable for at least the same reasons.

For at least the reasons set forth herein, Applicants respectfully submit that the combination of Granberg and Olsson fails to disclose or suggest Claims 51-72. Withdrawal of the rejection of Claims 51-72 under 35 U.S.C. § 103(a) over Granberg and Olsson is respectfully requested.

Attorney's Docket No. 033079-003Application No. 10/025,409

Page 6

Applicants respectfully submit that the application is in condition for allowance. Favorable consideration on the merits and prompt allowance are respectfully requested. In the event any questions arise regarding this communication or the application in general, the Examiner is invited to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

BUCHANAN INGERSOLL PC

Date: September 6, 2005By: 

M. David Ream

Registration No. 35,333

P.O. Box 1404
Alexandria, Virginia 22313-1404
(703) 836-6620